

Exhibit “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE Plaintiff, v. TRANS UNION LLC CITY OF PHILADELPHIA Defendant.	C.A. NO: 02-CV-4440
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DECLARATION OF NANCY CERBUS

Nancy Cerbus makes the following Declaration pursuant to 28 U.S.C. §1746:

1. I am Vice President, Data Services of Superior Information Services, Inc. ("Superior"). I am over the age of eighteen and I am duly authorized to make this affidavit on Superior's behalf.
2. Superior is in the business of gathering public record information from various sources and providing that information to consumer reporting agencies. This business is commonly referred to in the credit reporting industry as a "public records vendor." Superior is, by contract, Trans Union's public records vendor for several counties, including Philadelphia, PA.
3. By contract, Superior gathers information from various public record sources and provides such information to Trans Union. Superior is also responsible for verifying with the public record sources any information disputed by a consumer to Trans Union. Superior has developed and follows rigorous procedures to comply with the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.* (the "FCRA"). Superior is contractually obligated to follow rigorous procedures in gathering and verifying credit information.

4. Superior is paid on a volume basis for initially gathering information, and receives additional compensation for verifying information in connection with a dispute.

5. Superior initially obtains judgment information from the Philadelphia Municipal Court by tapes it receives directly from the City of Philadelphia. Superior in turn transmits the information it receives from the City of Philadelphia to Trans Union.

6. To verify disputed information, Superior sends an employee or contractor to the Courthouse to physically check the court records (a "verifier"). The verifier must check the original source at the courthouse. This is a material term of Superior's contract with Trans Union, and is defined in Public Record Process Standard PRG-008, attached hereto as Exhibit "1." PRG-008 states as follows:

Public Record information that resided on a consumer's file at the time of dispute must be reverified for accuracy at the original source of the data. Vendors who reverify information for Trans Union will locate the court that houses that information and check the accuracy and completeness thereof....

7. Verifiers are trained by Superior. The training teaches the verifier what information to look for and how to gather public record information. Among the many things verifiers are trained is the meaning of various parties to lawsuits, including plaintiff, defendant, counterclaimant, and counterclaim-defendant.

8. Verifiers are subject to periodic random audits pursuant to the attached verification procedure. See Exhibit "1," Audit Guidelines for Verification. Superior audits verifiers by actually comparing records collected by verifiers to the underlying court records to assure the information is accurate and complete.

9. Nicholas Palmer is an independent contractor verifier for Superior. Mr. Palmer has been working for Superior since May 12, 1998. Mr. Palmer's duties include verifying public record information in the Municipal Court of Philadelphia.

10 Mr. Palmer was contracted by Superior based upon his extensive experience in the Philadelphia court system. He has been employed by the Philadelphia Common Pleas Prothonotary since 1980.

11. Mr. Palmer has been randomly audited by Superior on many occasions and has passed every audit. Copies of available audit reports are attached hereto as Exhibit "2."

I declare under penalty of perjury that the foregoing is true and correct.



NANCY CERBUS

Executed on: 8/7/2003
DATE

Exhibit “A-1”

PUBLIC RECORD PROCESS STANDARDS	Process No. PRG-008
Process Name: Reverification Process	Creation Date: 11/20/96
Process Owner/Division: Consumer Relations Services (CRS)/Content Management Division (CMD)	
Revision Date:	
PURPOSE To standardize the process by which vendors reverify Public Record information for Trans Union.	
ORGANIZATIONAL IMPACT By standardizing this process we enhance the overall quality of our database by maintaining the most accurate and up-to-date information on our consumers.	
OVERVIEW Public Record information that resided on a consumer's file at the time of dispute must be reverified for accuracy at the original source of the data. Vendors who reverify information for Trans Union will locate the court that houses that information and check the accuracy and completeness thereof. Trans Union will supply to the vendor all available information on the consumer and the Public Record to facilitate the reverification process.	
BUSINESS RULES GOVERNING THE PROCESS	
<ol style="list-style-type: none"> Public Record Vendor shall make a good faith effort to return the form to Trans Union via fax, mail, or other mutually agreed upon means within 15 days of receipt of said dispute. In the event that a Public Record can either not be located or will require additional time past the 15 days, Public Record Vendor agrees to notify Trans Union via facsimile or via telephone. In the event that a CDV is received after the 15-day period referenced above, Trans Union will pay Public Record Vendor a mutually agreed-upon reverification price. Public Record Vendor agrees to verify all personal information, regardless of the individual dispute, including name, present and previous addresses, AKA where applicable, Social Security #, and any spousal information, and will mark this on the CDV form accordingly. Public Record Vendor agrees to submit written bills for service rendered to Trans Union which clearly show each reverification completed (docket, FIN, and the date received and returned). Public Record Vendor agrees to verify the following information in addition to those elements outlined in point 4: date, liability, type of assets, paid, city, state, plaintiff/attorney, docket, and Public Record type as they appear on this verification form (if applicable and available). Any changes to the above information shall be clearly indicated on the form supplied by Trans Union. In the event that the Public Record does not belong to the consumer in question, Public Record Vendor agrees to supply Trans Union with the name of the consumer to whose file the record belongs using the aforementioned criterion. Any information not provided by Trans Union to vendor in CDV process, that is discovered by vendor reverification process, shall be provided to Trans Union for update. 	

Exhibit “A-2”

**SUPERIOR INFORMATION SERVICES, LLC
AUDIT GUIDELINES for VERIFICATIONS
DATA QUALITY AND CONTENT**

Employee/Independent Training

- Review quality control procedures and guidelines. Provide written instructions and data samples to assist in job responsibilities.
- Completed work is reviewed 100% by a qualified QC Specialist/Verifications Researcher/Supervisor until this review exhibits zero errors per quality guidelines

Productivity Logs

- Management compiles weekly totals of processed data to determine if employee/independent standards are met, and to assist in evaluating and comparing total number of verifications processed per week by department as a whole.

Staff Auditing

- Computation of the verifications by the Field Collection staff is audited via normal QC procedures (work is reviewed before being added to database). Modifications/Update of verifications is completed by internal data entry staff. The completed Percentage of work audited increases proportionate to that of error rate, up to and including 100%. Results are documented on a report.
- Random auditing of Field Collection staff is conducted semi-annually. SIS audit staff requests a listing of 25 random cases per Field Collector, which is generated from the completed verification information. These cases are then given to a different Field Collector to review hard source copy from corresponding court. Hard source copies are compared against computer generated listing of database cases by auditing staff and Field Collectors are evaluated on a scale of pass / fail based upon department standards. If collectors fail semi-annual audit, more intensive auditing is conducted. Consequences of fail audits range from retraining to termination of Field Collector.

Auditing Tools

There are Research utilities used for auditing employees/independents, if there is a discrepancy between the information in the database and the new verification information that is verified. The research utilities tools include the following:

- Error reports (produced when loading data to the database) which include the identification of incorrect plaintiff / debtor names, incomplete or bad addresses, same SSN for multiple debtor names, and illogical progression of statuses.
- Duplicate case reports, which identify duplicate cases per county/state.

- SQL's that query the database per specified criteria.
- Email confirmation of successful transfer of collection into the database.

Pass/Fail Standards

Superior will Pass/Fail each Field Collector based on the verification information that is reviewed during the random audit procedures. The Field Collector will be notified if the standards are not based upon the Superior Department standards.

Exhibit “A-3”

Superior Information Services, LLC
Verification Audit Process
Ongoing Pass/Fail Analysis

Audit Analysis

Purpose of Audit

The intention of this audit is to ensure the information (be it Bankruptcy, Judgment, Lien, or Tax Warrant) supplied by the judicial system is reflected accurately on the consumers true credit portfolio, as well as to outline the modifications that need to be completed to ensure the accuracy and validity of data being reported.

Total Errors:

Based on the results of this audit, the data accumulated does meet Superior's standards. The summation of the audit outlines and specifies the types of class errors revealed in the audit.

Comments and Recommendations

Finally finishing up the Sept. Audits. 25 Randoms. All ok.

Catalog Information	
Auditor	CK
Date	10/3/2001
Batch Number	GA3
Vendor	Superior
Court	Philadelphia
State	PA
Type	Judgment
Collector Name	Nicholas Palmer
Collector ID	LMER
Date Extracted	9/5/2001
Date Range	last 6 months

Feb 2002

Superior Information Services, LLC
 Verification Audit Process
 Ongoing Pass/Fail Analysis

Audit Analysis

Purpose of Audit

The intention of this audit is to ensure the information (be it Bankruptcy, Judgment, Lien, or Tax Warrant) supplied by the judicial system is reflected accurately on the consumers true credit portfolio, as well as to outline the modifications that need to be completed to ensure the accuracy and validity of data being reported.

Total Errors:

Although review has concluded that this audit has passed.

Based on the results of this audit, the data accumulated does meet Superior's standards.
 The summation of the audit outlines and specifies the types of class errors revealed in the audit.

Comments and Recommendations

Random 25. Visited Court today. All passed.

Catalog Information	
Auditor	SH
Date	2/28/2002
Batch Number	How
Vendor	Superior
Court	Philadelphia
State	PA
Type	Judgment
Collector Name	Nicholas Palmer
Collector ID	LMER
Date Extracted	2/18/2002
Date Range	last 6 months

Catalog Information	
Auditor	JE
Date	2/12/2003
Budget Number	
Vendor	Superior
Court	Philadelphia
State	PA
Type	Judgment
Collector Name	Nicholas Palmer
Collector ID	LMER
Date Extracted	2/11/2003
Date Range	last 6 months